

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
COLORADO STATE OFFICE
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LAKEWOOD, COLORADO 80215-7093
September 6, 2000

In Reply Refer To:
CO-932
6500 (P)

Instruction Memorandum No. CO-2000-035
Expires 09/30/2001

To: Field Office Managers

From: State Director

Subject: Animal Damage Control Activities

Purpose: To provide additional guidance to Bureau of Land Management (BLM) Field Managers regarding animal damage control activities as outlined in the statewide Memorandum of Understanding (MOU) for management of predators causing damage on public lands. A fact-finding team was formed by the State Director to review existing authorities and interrelated jurisdictions for aerial hunting of predators on BLM managed lands. This was in response to a request to halt aerial gunning on BLM lands by Sinapu and a coalition of environmental and animal welfare groups. A copy of the Colorado MOU is enclosed.

Policy/Action: Requires immediate action to be taken by Field Office Managers in reviewing annual predator damage management (PDM) work plans to ensure implementation actions are in conformance with Resource Management Plans (RMPs) goals and decisions. A written response will be provided to APHIS-Wildlife Service along with a copy filed with the work plan documenting who conducted the conformance review and any special considerations or restrictions that were agreed to. This formal review and written response will serve as our concurrence with the work plan.

Background: As stated in the state level MOU, APHIS-Wildlife Services is responsible for scheduling and conducting annual interagency meetings to review proposed predator control activities with BLM Field Offices. Meetings are to be scheduled through the three BLM Centers and held prior to December 1 of each year. Annual PDM work plans prepared by APHIS-Wildlife Services should display all planned control activities (techniques, dates, target species) by specific grazing allotment or area, any imposed restrictions and limitations, and a colored coded map of no control zones (red) and requested control areas (green). Control activities that cannot be delineated on a map should be presented in narrative form. This may include limitations or restrictions within control zones, situations for implementing emergency control needs, and activities to prevent depredation problems in high risk areas. An annual report of the previous year's control activities listing all target and non-target animals taken by method, grazing allotment or area, and species should be provided with the current PDM annual work plan being presented by APHIS-Wildlife Service.

Actions Required: The Field Manager will review PDM annual work plans to ensure conformance with the RMPs and any other special legislative or executive office designation such as Wilderness Study Areas (WSA), National Conservation Areas, or Monuments. APHIS-Wildlife Services is responsible for being in accordance with the Endangered Species Act and in compliance with the National Environmental Policy Act for all animal damage control activities occurring on BLM public lands.

Conformance Review Check List:

1. Determine whether predator control activities are specifically addressed as a management practice or action in the RMP. In most cases, if not all, RMPs are silent on the implementation of predator management or damage control activities.

2. If not addressed in the RMP, review the implementation actions in the PDM work plan against the resource management action goals and objectives in the RMP. Document any resource concerns or conflicting issues that are likely to result from implementing predator management and control activities. Jointly develop mitigation or restrictions to resolve these concerns or issues before implementing the PDM work plan.

3. If predator management or damage control activities are cited as a management action in the RMP, document this in your review and review the PDM work plan for conformance with RMP.

4. Determine BLM areas proposed for predator control activities, control periods or season, and method of control and evaluate whether control activities being proposed for public land should be prohibited to protect human life (human safety zones), i.e., campgrounds, communities, trail heads, or roads. Determine if proposed control activities are on public lands with special management designated through the RMP land use decision process that would require special management consideration, i.e., WSA's or Special Recreation Management Areas.

5. Review PDM annual work plans for potential impact to sensitive or endangered species and their habitat and the need for seasonal restrictions or limitations such as eagle nesting areas or big game wintering areas.

6. Inform APHIS-Wildlife Services of BLM requirements for conducting aerial control activities in WSAs. Preapproval by the State Director is required before aerial control activities can be conducted in WSAs by Wildlife Services.

7. It is Colorado BLM's policy to notify members of the public when they ask to be kept informed regarding Wildlife Services control operations occurring on public lands.

8. Predator management and control activities in National Monuments and National Conservation Areas must specifically target individual predators rather than predator populations. Pre-approval by the State Director is required before aerial control activities can be conducted.

Manual/Handbook Affected: None. BLM Manual Section 6830 was rescinded pending revision and re-issuance of a new manual. Bureau guidance is provided in the Master MOU (1995) between BLM and APHIS. Supplemental Colorado guidance is provided in Colorado's state level MOU (1999).

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Signed by
Ann J. Morgan
State Director

1- Attachment:
Colorado MOU for Management of Predator Caused Damage on Public Lands